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CHURCH OF SCIENTOLOGY



U.S. Department of Justice
Office of the Associate Attorney General

June 29, 1981

To: Fred

From: Rudy

Could you handle this one for us?

Called 8/11

files - Fred

Memorandum

Filed - Files



Subject Founding Church of Scientology of
Washington, D.C., Inc. v. Director,
Federal Bureau of Investigation, et al.

Date
July 14, 1981

To Stuart E. Schiffer
Acting Assistant Attorney General
Civil Division

From Rudolph W. Giuliani
Associate Attorney General

By memorandum dated June 23, 1981, you asked me to review this office's files to locate records from the period 1968 through 1975 responsive to the plaintiff's original and supplemental interrogatories and requests for production of documents. Please be advised that the Office of the Associate Attorney General was not established until 1977. Accordingly, no records of this Office exist for the period 1968 through 1975.

23 JUN 1981

Founding Church of Scientology of
Washington, D.C., Inc. v. Director
Federal Bureau of Investigation,
et al., USDC D.C., C.A. No. 78-0107

BO'M:AMGulyassy:dak
145-12-3526
Telephone: 633-4263

Mr. Rudolph W. Giuliani
Associate Attorney General

Stuart E. Schiffer
Acting Assistant Attorney General
Civil Division

On January 2, 1980, the Civil Division requested that you review your records to provide responses to discovery in the above-entitled action.

Since our initial request, the Court on April 22, 1981, expanded the scope of discovery by overruling our objection to providing discovery prior to 1975. The cut-off date was rolled back to 1968, on the premise that after plaintiff had filed its first lawsuit in 1977, defendants might have ceased creating and transmitting documents evidencing objectionable activities directed toward plaintiff and that, on the other hand, records of government harassment, conspiracy, etc. might exist in records from the period 1968-1975.

The Court has thus allowed plaintiff to propound supplemental interrogatories and requests for production of documents which seek information reflected in records post-dating January 1, 1968 (attached hereto). Further, we must update our previous answers and document production to cover the period 1968-1975. Accordingly, we again request that you designate someone within your office to coordinate the new discovery responses.

In reviewing the supplemental interrogatories we have determined that a number of general objections are appropriate:

1. We will not provide answers regarding "affiliated religious organizations" or plaintiff's "members, officers or attorneys." Accordingly, your answers should pertain to plaintiff Founding Church of Scientology and the class certified as all "Churches and Missions of Scientology in the United States." This objection also applies to the request for production of documents.

2. We object to Interrogatories 11, 12, 13, 17, 18, 19, 24, and 25 on the grounds that they are too vague and general to

-2-

require responses pre-1968. The recent Order provided that plaintiff might seek information pre-1968 as to "specific" instances or allegations. We contend plaintiff has failed to draft these Interrogatories with the required specificity.

3. We object to Interrogatory 4 to the extent it seeks information subject to attorney-client privilege.

Responses on behalf of the Department of Justice must be filed by July 17, 1981. Accordingly, we request that your designee contact Anne M. Gulyassy (633-4263) or Lawrence A.C. Moloney (633-3381) immediately to discuss preparation of your answers. We further request that you produce all relevant documents and prepare draft answers to interrogatories by July 10, 1981. Please note whatever objections you believe apply to the discovery and the bases therefor.

Thank you for your cooperation.

Attachment

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

THE FOUNDING CHURCH OF SCIENTOLOGY)
OF WASHINGTON, D.C., INC.)

Plaintiff,)

v.)

DIRECTOR, FEDERAL BUREAU OF)
INVESTIGATION, et al.,)

Defendants.)

Civil Action No. 78-0107

PLAINTIFF'S SUPPLEMENT TO FIRST
SET OF INTERROGATORIES TO DEFENDANTS

The following interrogatories are propounded pursuant to Rule 33, Fed. R. Civ. P., and the Order of the Magistrate filed April 22, 1981. Each interrogatory must be answered separately and fully in writing under oath, within the time prescribed by the Court Stipulation signed by Judge Green on April 27, 1981.

INSTRUCTIONS

Unless otherwise expressly indicated, plaintiff hereby incorporates all interrogatories propounded in Plaintiff's First Set of Interrogatories, dated February 13, 1978. Unless otherwise expressly indicated, the conditions controlling in Plaintiff's First Set of Interrogatories shall continue to apply to the interrogatories propounded herein.

The following additional instructions shall be controlling as to all interrogatories propounded in Plaintiff's First Set of Interrogatories and to all supplemental interrogatories propounded herein.

1. The time period covered by Plaintiff's First Set of Interrogatories, dated February 13, 1978, and the Interrogatories below is January 1, 1968 to the present time, unless otherwise specified. The time period covered by the "Specific" interrogatories below is January 1, 1955 to January 1, 1968 unless otherwise specified.

2. These interrogatories are of an ongoing nature and, should any defendant obtain, acquire or otherwise come into additional or further information responsive to these interrogatories, the answers thereto shall be updated to provide that information.

3. If any answer to an interrogatory is contained in the answer to a previous or subsequent interrogatory, it may be incorporated by identifying the portion of such previous or subsequent answer in which the information is contained.

4. If a request is made for production or identification of documents which are no longer in the possession or subject to the control of a defendant, state when such documents were most recently in the possession of or subject to the control of a defendant and what disposition was made of them, including an identification of the person presently in possession or control of such documents. If the documents have been destroyed, identify the type of document, its date of origin, its author and recipient, the person who destroyed the documents and the person who directed that the documents be destroyed, state when such documents were destroyed, state the reasons the documents were

destroyed, and identify all persons having knowledge of the content of such documents.

5. For each interrogatory or part thereof which defendants refuse to answer on grounds of burdensomeness, state (a) the number of files and/or documents needed to be searched; and (b) the location of such files.

6. Each interrogatory is to be answered on the basis of the entire knowledge of defendants, including information in the possession of defendants, their agents, representatives, attorneys and subordinate agencies, offices and departments.

7. If any of the following interrogatories cannot be answered in full, please answer to the extent possible and specify the reason for your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion. If your answer is qualified in any particular, please set forth the details of such qualifications.

8. These instructions and the definitions set forth supra apply to each and every interrogatory, whether specifically referenced in the particular interrogatory or not.

DEFINITIONS

The definitions provided in Plaintiff's First Set of Interrogatories shall be controlling herein as to both general interrogatories covering the period January 1, 1968, through the present and as to specific interrogatories covering the period 1955 through January 1, 1968, and 1955 through the present, with

the following exception that the additional definitions provided below shall now apply to each defendants' response to the interrogatories propounded in Plaintiff's First Set of Interrogatories as well as to the general and specific interrogatories propounded herein.

1. "Document" or "documents" shall mean any kind of written, recorded, or graphic matter, however produced or reproduced, of any kind or description regardless of origin or location, whether sent or received or neither, including originals, copies, drafts and both sides thereof, and including but not limited to entire files, live files, back-up files, informant files, information item files, soft files, squirrel files, numbered case files, investigative files, convenience files, personality files, biographical data files, civil disturbance files, incident files, dossiers, compendiums, card files, personnel security clearance dossiers, mug books, surveillance files, domestic security files, contracts, agreements, orders, notes, agents' notes, letters, memoranda, correspondence, invoices, pamphlets, cards, index cards, periodicals, telegrams, cables, telex messages, reports, raw data reports, spot reports, agent reports, records, studies, interoffice or intraoffice communications, working papers, talking papers, applications, permits, charts, papers, graphs, surveys, indices, tapes or other recordings, discs, data processing cards, sheets, discs or tapes, files, transcripts, diaries, calendars, lists, black lists, schedules, analyses, accounts, objects, statements, manuals, drawings, technical proposals, personnel records, minutes and records of discussions, photographs, and any drafts, copies, photocopies, facsimiles, xeroxes, photographs,

blueprints, books, tape recordings, videotapes, or microfilms, tangible things, notes, notations, inter and intradepartmental communications, communications to, from, between or among directors, officers, agents, consultants or employees, transcripts, minutes, reports and recordings (and any transcriptions thereof) of telephone or other conversations, or of interviews, or of conferences, or of meetings, affidavits, statements, summaries, opinions, reports, indices, studies, analyses, evaluations, court pleadings, subpoenas, civil investigative demands, contracts, licenses, agreements, ledgers, journals, tabloids, books of records of account, summaries of accounts, balance sheets, income statements, checks, vouchers, check registers, orders for payment, questionnaires, answers to questionnaires, statistical records, desk calendars, appointment books, diaries, telephone logs, lists, tabulations, charts, graphs, maps, surveys, sound recordings, data sheets, magnetic tapes, computer programs, computer program coding sheets, all other records kept by electronic photographic or mechanical means, and things similar to any of the foregoing, regardless of their authority or origin, however delineated by a defendant, of which a defendant has knowledge, whether or not such documents are in a defendant's possession, custody or control.

2. The word "identify," when used with respect to a natural person, including but not limited to informants and infiltrators, means his or her full name, code number if applicable, file number if applicable, present or last known home and business address (including street name and number, city or town, state and ZIP Code) and telephone numbers, present or last known position, job title and employer, and all positions, job

titles, and descriptions of jobs held with defendants, as well as any other contractual or other relationship with defendants or, to defendants' knowledge, with any other government agency and the dates of the person's tenure in each position.

3. The word "identify," when used with respect to a document, means to state the name or title of the document, the type of document, its date, the color-code, the person who authorized it, the person who signed or made it, the person to whom it was addressed, the person to whom it was sent, its present location, the form in which it is retained, any code key (including computer key and program) necessary to retrieve or decipher it, its present custodian, and to which subpart of the interrogatory, if any, the document relates.

4. The word "identify," when used with respect to any investigation, shall be understood to require its title, file number, code words, classification, caption or category, date that such investigation was opened, terminated, and re-opened, or date that a defendant first became a participant in the investigation of another agency or department, and the date that such participation terminated.

5. The word "identify," when used with respect to an act or other form of conduct, shall be understood to require the date on which and the place at which such act or conduct occurred, the name, address and capacity of the individual who committed such act, and the identity of each individual present or who witnessed such act or other conduct being done or performed.

6. The word "identify," when used with respect to any communication, shall be understood to require the identity of the natural persons making and receiving the communication, their respective principals or employers at the time of the communication, the date, manner and place of the communication, and the identity of each individual who was present or otherwise witnessed the making of such statement or other communication.

7. The term "communication" means any contact between two or more persons or entities and shall include, but not be limited to, any written, recorded, graphic or oral statements, testimony, question, command, supposition or conjecture, however produced or reproduced, and whether or not made under oath, which is made, distributed, or circulated between or among persons, or data storage or processing units, and any and all documents containing, consisting of, or relating or referring to, a communication.

QUESTIONS

A. Questions Regarding Surveillance Activity

1. With respect to each defendant, identify all investigations of any nature initiated and/or participated in that involved plaintiff, or its affiliated religious organizations and/or the officers or members thereof, and include in said list:

(a) factual and legal basis of each such investigation;

(b) the names of all other federal, state, municipal and/or private agencies or organizations that have participated in each such investigation;

(c) the identities of all personnel directly responsible for coordinating and/or overseeing each such

investigation;

(d) the statute[s] and/or regulation[s] authorizing and/or governing in any manner each such investigation.

2. Identify any investigation or intelligence gathering activities or programs not exclusively directed towards plaintiff, its affiliated religious organizations, officers and/or members, that included the gathering of information about plaintiff, its affiliated religious organizations and/or officers and members, including, but not limited to such programs as: CONUS, CONCISINTEL, MINARET, SHAMROCK, LEPRECHAUN, COINTELPRO, H.T. LINGUAL, CHAOS, M-K ULTRA, BLUE BIRD, ARTICHOKE, MERRIMAC, DISRUPTION PROGRAM, INTELLIGENCE GATHERING AND RETRIEVAL SYSTEM ("IGRS").

(a) Identify all actions taken as a result of plaintiff, its affiliated religious organizations and/or officers and members having been subjected to such investigation, activities or programs;

(b) Identify all decisions and subsequent actions to terminate any such investigation or intelligence gathering activity concerning plaintiff, its affiliated religious organizations, officers and/or members; and

(c) Identify all documents concerning plaintiff, its affiliated religious organizations and/or officers and members that pertain to such investigations, activities and/or programs.

Give Denier
085. For CIA
B. Questions Regarding Agency Reports, Records, etc.

3. Identify with respect to all agencies or departments those individual(s) responsible for, or who carried out:

(a) searching the agency's or department's files for documents responsive to any of plaintiff's interrogatories and requests for production of documents;

(b) making deletions in documents produced to plaintiff;

(c) withholding documents for whatever reasons;

(d) applying deletion codes to pages containing deleted matter;

(e) preparing an index of deletions;

(f) making objections to plaintiff's request; or

(g) any other duties involved in the preparation of responses to plaintiff's requests.

CIA-041 4. As to each individual identified in response to Interrogatory 3 (above), state whether he or she received any oral or written instructions with regard to the performance of his or her duty. State the name(s) of such individual(s) providing such instructions, and the instructions that were given.

5. With respect to each defendant, including any subordinate agency or subdivision, which possesses, maintains or at any time during the period of this lawsuit has possessed or maintained files, records, or documents of any nature regarding plaintiff or any of its affiliated religious organizations and/or the officers or members thereof:

(a) identify all codes, categories, titles, headings, label terms, file numbers, cross-reference codes and the like under which such files, records or documents have been and/or are currently indexed and/or maintained;

(b) designate by index any such files, records or

documents that have been and/or are currently maintained in a computer data bank or other automated retrieval system;

(c) provide a separate index of all computer data banks or other automated retrieval systems that contain files, records or documents of any nature regarding plaintiff or any of its affiliated organizations, that are or have at any time been accessible to the defendants.

(1) Identify the location(s) of each such data bank and/or automated retrieval system, whether or not they are on the premises of a named defendant.

(2) Identify for each such data bank and/or automated retrieval system which other federal, state and/or municipal agencies have ever had or currently have access to the information contained therein.

(3) Indicate for each such data bank and automated retrieval system whether it includes or references any documents, files or records that pre-date January 1, 1968, regarding plaintiff or any of its affiliated religious organizations and/or the officers or members thereof.

(4) With respect to each such data bank and automated retrieval system, specifically describe what records, if any, were prepared that reflect the identity of the persons and/or agency requesting retrieval of data; and/or the date of such request; and/or the data requested and/or retrieved.

6. With respect to each defendant, identify and describe any and all policies and/or practices, including documents

reflecting such policies and/or practices, relied upon or utilized that resulted in any alteration of the appearance, organization and/or content including "cutting and pasting" of any document(s), released, irrespective of its date, with or without deletions, to plaintiff and/or its affiliated organizations pursuant to requests made under the Freedom of Information Act, and as to each such incident of alteration state:

- (a) the identity of all persons involved in making and/or authorizing such alterations;

- (b) the purpose of such alteration;

- (c) the date such alteration occurred;

- (d) the statute[s] and/or regulation[s] authorizing and/or governing in any manner the alteration of such documents; and

- (e) whether any asterisks, symbols, phrases or codes that indicate the use of surveillance, black bag jobs, surreptitious entries or electronic eavesdropping of plaintiff, its affiliated religious organizations and/or members or officers, were deleted from any document released or withheld, irrespective of the date of the document.

7. Identify all documents that were prepared, received, maintained, or disseminated by the IRS between 1955 through the present which were categorized as "activist," "militant," "intelligence," "subversive," "sabotage," or "509," that pertained to plaintiff, its affiliated organizations and/or officers and members.

8. As to each defendant, identify all documents prepared

for any purpose subsequent to January 1, 1968, that identify any pre-1968 surveillance activities of the character described in Plaintiff's First Set of Interrogatories, Part A, "Questions Regarding Surveillance Activity," 1 through 5 at pp. 4-5, that involved the premises of or persons associated with plaintiff or any of its affiliated religious organizations, or any officer or member thereof, or any attorney who at the time of such surveillance was engaged in representing any such organization, officer or member.

9. Did the FBI prepare a symbol number sensitive source index that indicates the occurrence of surreptitious entries prior to July, 1966, which were authorized by FBI Headquarters. If so, state: (a) whether this index is organized in a fashion that would enable the agency to determine the individual and/or organization subjected to such surreptitious entries, and (b) if so, state whether any surreptitious entries indicated on this index involved present or former premises of plaintiff, its affiliated religious organizations, and/or officers and members.

10. Were documents collected or maintained by any defendant between January 1, 1955, and January 1, 1968 concerning plaintiff, its affiliated religious organizations and/or officers and members, disseminated subsequent to January 1, 1968, and/or utilized in any investigation or administrative action subsequent to January 1, 1968.

If so, identify with respect to each such dissemination: (a) the author and/or transmitter of the disseminated document; (b) the recipient thereof; (c) the purpose of the dissemination; (d) the date(s) of the dissemination; (e) the authority, if any,

for the dissemination; (f) the documents disseminated; (g) the steps, if any, taken to verify the information prior to its dissemination; and (h) whether any information so disseminated was ever learned to be false and, if so, what steps were taken to correct it.

C. Specific Questions Regarding Employment Discrimination

11. (a) Have any defendants at any time during the period January 1, 1955 through the present subjected any of their employees or applicants for positions of employment or employee of or applicant for employment with any individual, organization or corporation, doing business for or with any federal agency, to investigation, interrogation or other special scrutiny, because they are or were alleged to be Scientologists connected with the plaintiff or any of its affiliated religious organizations.

(b) If the answer to (a) is "yes," state with respect to each such instance (1) the name of the employee or applicant; (2) the agency, subordinate agency, company or subdivision involved; (3) the nature of the investigation, interrogation or scrutiny; (4) the substance of the information derived therefrom; (5) the efforts, if any, to verify the information; and (6) the personnel action taken, if any, including favorable recommendations, adverse recommendations, granting security clearances, denial of security clearances, hiring, firing, declining to hire, promoting, declining to promote, transfer, etc.

12. (a) Have any defendants, at any time during the period of January 1, 1955 to the present, disseminated any documents concerning plaintiff or its affiliated organizations

and/or members in response to any request by any non-defendant federal agency for information concerning any employee or applicant for employment with the agency or any employee or applicant for employment with any individual, organization, or corporation doing business for or with any federal agency.

(b) If the answer to (a) is "yes," identify with respect to each such dissemination: (1) the name of the employee or applicant; (2) the agency, subordinate agency, company or subdivision originating the request; (3) the nature of the request; (4) the substance of the documents/information disseminated; (5) the efforts, if any, to verify the information; and (6) the personnel action taken, if any, including favorable recommendations, adverse recommendations, granting security clearances, denial of security clearances, hiring, firing, declining to hire, promoting, declining to promote, transfer, etc.

D. Specific Questions Concerning Incidents of Harassment and Discrimination Occurring Prior to 1968

O 13. From approximately 1955 through 1968, government agencies initiated, participated in, cooperated with, provided information for utilization in and/or gathered information through repeated and/or prolonged investigations directed towards plaintiff, its affiliated religious organizations and members. These government agencies include, but are not limited to the following: U.S. Department of Justice, U.S. Attorney's Office, Federal Bureau of Investigation, U.S. Postal Service, Department of Treasury, BNDD, Customs, USNCB, IRS and Department of Defense/Army. As to each defendant:

(a) Identify, in chronological order, each such investigation initiated by each agency and identify all

other agencies, whether defendants' or not that participated in such investigation;

(b) Identify, in chronological order, each such investigation participated in by the agency, but not initiated by the agency and identify (1) the agency(s) requesting such participation, (2) the agency coordinating the investigation, and (3) other agencies, defendants or otherwise, U.S., foreign, state or municipal, government or private organizations, that participated in each such investigation;

(c) State the agency's factual and legal basis for initiating, re-opening or participating in each such investigation and the purpose for terminating such investigation or terminating participation in such investigation;

(d) State as to each such investigation whether the agency communicated with informants;

(e) State whether the agency engaged in any physical or electronic surveillance in connection with each such investigation, or otherwise obtained information that was acquired by such surveillance;

(f) State whether any documents sent through the mail to or from plaintiff, its affiliated religious organizations and/or members was intercepted, opened, copied, monitored and/or detained in connection with each such investigation and identify all such documents.

14. On December 1, 1958, and January 7, 1959, meetings were held in the United States Attorney's Office for the District of Columbia for the purpose of coordinating and planning an

interagency investigation of the Church of Scientology. Present at these meetings were representatives from United States Attorney's Office, the Department of the Army, Post Office Department, Food and Drug Administration and the District of Columbia Police Department.

- (a) identify the investigations that were the subject of these meetings;
- (b) state the purpose of these investigations;
- (c) state the participatory role of each above entity in these investigations and the statutes and regulations authorizing such participation;
- (d) state whether these investigations involved the use of informants, infiltrators, physical surveillance, mail covers, and electronic surveillance, or any interception of the communications of plaintiff, its affiliated religious organizations and/or officer and members;
- (e) identify any other federal, state or local agencies which were directly or indirectly involved in these investigations; and
- (f) state whether any private organizations were directly or indirectly involved in these investigations.

15. On or about December 12, 1961 the Department of Defense/Army created, maintained and disseminated a document entitled "Scientology and Dianetics." As to this document:

- (a) identify all other federal and/or non-federal agencies that contributed, directly or indirectly, information contained in this document;
- (b) identify all documents relied upon to create this document;

- (c) identify all agencies and persons that were provided a copy of, loan of, or access to this document and the date of such action;
- (d) identify all other documents that accompanied any dissemination of this document identified in 14(c);
- (e) identify each defendant that currently has a copy of or access to this document;
- (f) describe the meaning of the designation "(u)" that precedes certain paragraphs and sentences in this document;
- (g) describe the meaning of the designation "(c)" that precedes certain paragraphs in this document;
- (h) describe the meaning and use of the designation "carded" that is stamped on portions of this document, adjacent to the Scientology affiliated organizations listed therein.

16. On July 13, 1959, the Department of the Army, Office of the Assistant Chief of Staff for Intelligence issued a letter subject-referenced as: "Scientology, Dianetics, Hubbard Guidance Center, et al.," requesting that that office be furnished information concerning this subject and further requesting that in the event members or civilian employees of the Department of the Army are identified with this subject, or any of its subsequent affiliates, a report be submitted to the Chief, Investigations Branch, Security Division, Office of the Assistant Chief of Staff for Intelligence, Department of the Army, in the Pentagon. Identify all documents that were prepared, or disseminated in response to, or that otherwise pertain to the request contained in the aforementioned letter.

○ 17. Did the Federal Bureau of Investigation, between 1955 through 1968, disseminate documents concerning plaintiff, its affiliated religious organizations, and/or officers and members to the U.S. Department of Defense/Army. If so:

(a) state whether any of the documents or information so disseminated by the FBI were obtained through informants -- if so, identify all such informants;

(b) state whether the FBI furnished documents concerning plaintiff, its affiliated religious organizations, officers and/or members to other U.S. military or intelligence agencies during the aforementioned period;

(c) identify the agencies that were provided with such documents; identify the documents that were disseminated and state the reasons for such dissemination.

(d) identify the steps, if any, taken to verify the contents of such documents prior to dissemination and state whether any information contained in such documents was ever learned to be false, and, if so, what steps were taken to correct it.

○ 18. Did the FBI disseminate documents concerning plaintiff, its affiliated religious organizations, and/or officers and members during the period 1955 through 1968 to any foreign governments and/or subdivisions thereof. If so: (a) identify all such governments and/or subdivisions; (b) identify all such documents; and (c) the dates such documents were transmitted.

○ 19. Between 1955 continuing at least through 1968, did

the Federal Bureau of Investigation disseminate documents and/or information pertaining to plaintiff, its affiliated religious organizations and/or officers and members, to other defendants, federal agencies, state agencies, police departments and/or private organizations. If so, state:

(a) Whether any such dissemination included direct or indirect quotations from or references to statements contained in the divorce complaint of Sarah Northrop Hubbard, dated April 23, 1950;

(b) Whether the FBI was in possession of, or aware of the fact that the statements contained in Sarah Northrop Hubbard's affidavit were retracted as false on June 11, 1951; and provide the date that the FBI obtained possession of or became aware of said retraction; and

(c) Whether any incident of dissemination containing information of the sort described in 19 (a) occurring after January 1, 1955 did not include specific reference to the retraction identified in 19 (b) and if so, provide the date of such dissemination, the identity of the recipient, the purpose of the dissemination, and the reason for omitting the retraction.

20. In 1963, agents of the Food and Drug Administration, acting in concert with or at the direction of members of the United States Attorney's Office for the District of Columbia seized numerous devices, known as "Hubbard Electrometers" or "E-Meters" belonging to plaintiff and its affiliated religious organizations. As a result of this seizure, plaintiff was required to engage in extensive litigation, which ultimately resulted in the return of the seized devices. With respect to the

initiation of this seizure, (a) did the FDA conduct an investigation of the E-Meters and the use thereof in the religious practices of Scientology; (b) following such investigation, did the FDA recommend against the initiation of formal proceedings against the E-Meters; (c) if so, was a decision made by the United States Attorney's Office or the Department of Justice to override this recommendation and seize the devices; (d) if so, who was responsible for the final decision; and (e) on what information and/or legal considerations was this decision based.

21. During the approximate period 1955 through 1968, the Department of Justice and the IRS, cooperatively and independently, engaged in a series of extensive investigation and tax litigation concerning plaintiff and its affiliated religious organizations. The following interrogatories pertain to these investigations and activities conducted during the aforementioned period.

(a) Did the IRS and/or the Department of Justice receive any oral or written communication to investigate and/or modify the tax status of plaintiff, and/or its affiliated religious organizations. If so, identify such communications.

(b) did the IRS or the Department of Justice request, or obtain or review any documents of any other federal agency or non-federal police department or private organization and/or foreign government concerning plaintiff, its affiliated religious organizations, and/or officers and members. If so, identify that agency, department, government, or organization and the document requested, obtained, or reviewed and the

date(s) of such activity;

(c) did any agencies, including but not limited to the FBI, the FDA, the United States Attorney's Office and the Department of the Army, directly or indirectly provide or make available any documents to the IRS or the Department of Justice concerning plaintiff, its affiliated religious organizations, or officers and members. If so, identify the agencies, the date(s) of such activity, and the documents provided and/or made available.

(d) did the IRS and/or Department of Justice obtain, directly or indirectly, any documents or information from informants. If so, identify the informants, the documents or information obtained and the date such documents or information were obtained;

(e) did the IRS or Department of Justice obtain, examine or use any documents or information obtained directly or indirectly by means of trespass, physical surveillance, electronic surveillance or mail cover of plaintiff, its affiliated religious organizations and/or officers and members. If so, identify such documents and information.

(f) did the IRS or Department of Justice directly or indirectly provide any documents concerning plaintiff, its affiliated religious organizations or members to any foreign governments. If so, identify the foreign governments and documents and state the purpose for which such documents were provided;

(g) did the IRS or the Justice Department suggest, request or recommend that an investigation be conducted

or adverse action be taken concerning plaintiff, its affiliated religious organizations, and/or officers and members by any of the following entities: (1) FBI; (2) Postal Service; (3) Immigration and Naturalization Service; (4) Department of Labor; (5) BNDD/DEA; or (6) Bureau of Customs. If so, identify the nature of the investigation or adverse action suggested, requested or recommended and any documents containing such suggestions, requests or recommendations.

22. On or about November 11, 1967, Mr. Shirley Foley, of the U.S. Department of Labor, wrote a memorandum containing various allegations related to plaintiff, its affiliated religious organizations and/or officers and members. Did any defendant, at any time, obtain either a copy of this memorandum, a summary of this memorandum, or any documents containing a reference to this memorandum. If so, (a) identify the documents obtained; (b) the date they were obtained; (c) the person and agency from whom it was obtained; (d) state whether or not the documents were subsequently disseminated; (e) if so, state the date(s) of such dissemination; (f) the purpose of such dissemination; (g) identify the person, agency, government, or organization to whom such documents were disseminated; and (h) any investigations conducted, adverse action taken or administrative proceedings held which relied upon, included or referred to the allegations contained in Mr. Foley's memorandum.

CIA can't find

23. Does the Central Intelligence Agency (CIA) possess a document dated November 28, 1950, addressed to the Deputy Chief of I & S staff regarding "data concerning a candidate for

Relevance

indoctrination." If so, state:

- (a) the identity of the "candidate" referenced therein;
- (b) the nature of the prior involvement of the referenced "candidate" with dianetics;
- (c) the meaning of the phrase "adaptable for indoctrination" as used in this document;
- (d) whether the CIA's files indicate that the referenced "candidate" was ever a member of, associated with, or investigator of plaintiff, its affiliated religious organizations and/or offices, or members;
- (e) whether the referenced "candidate" served as an agent, employee, or informant for any federal agency simultaneously with any membership, association or investigation identified in 23 (d).

○ 24. Did the CIA, during the period between 1957 and 1968 conduct any "traces" related to plaintiff, its affiliated religious organizations and/or officers or members. If so, identify:

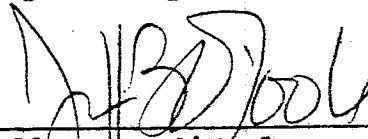
- (a) the meaning of the term "trace";
- (b) the date each such trace was initiated;
- (c) the person, agency, government and/or organization requesting and/or receiving information from each such trace;
- (d) the purpose of each such trace;
- (e) any information acquired through such trace(s) and disseminated by the CIA.

○ 25. Did any of defendants obtain information concerning plaintiff, its affiliated religious organizations and/or officers

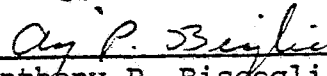
*Object
+
refer to
FOIA
products
+
Limits -
only info
based on
FOIA
discovery*

and members through the use of physical, electronic, or mail surveillance, surreptitious entry, trespass, black-bag jobs or theft prior to January 1, 1968. If so, identify: (a) the individuals involved in such activity; (b) the dates and places of such activity; (c) the purpose of such activity; and (d) the documents and information obtained by such means.

Respectfully submitted,



Jeffrey B. O'Toole



Anthony P. Bisceglie

DATED: May 12, 1981

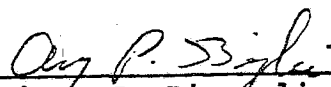
CANAN, BURNS & O'TOOLE, P.C.
511 E Street, N.W.
Washington, D.C. 20001
(202) 347-5212

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Plaintiff's Supplement to First Set of Interrogatories to Defendants was mailed, postage prepaid, this 12th day of May, 1981 to:

Lawrence A.G. Moloney, Esq.
Department of Justice
10th and Constitution Avenue, N.W.
Civil Division -- Room 3339
Washington, D.C. 20530



Anthony P. Bisceglie

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

THE FOUNDING CHURCH OF SCIENTOLOGY)
OF WASHINGTON, D.C., INC.,)

Plaintiff,)

v.)

Civil Action No. 78-0107

DIRECTOR, FEDERAL BUREAU OF)
INVESTIGATION, et al.,)

Defendants.)

PLAINTIFF'S SUPPLEMENT TO FIRST
REQUEST FOR DOCUMENTS

Pursuant to Rule 34, Federal Rules of Civil Procedure, the Magistrate's Order filed April 22, 1981, and the Stipulation signed by Judge Green on April 27, 1981, plaintiff hereby requests that defendants produce and permit plaintiff, or persons acting on its behalf, to inspect and copy the documents designated below.

INSTRUCTIONS

1. Unless otherwise expressly indicated, plaintiff hereby incorporates all requests for documents propounded in Plaintiff's First Request for Documents, filed on or about June 23, 1978. Unless otherwise expressly indicated, the instructions and conditions controlling in Plaintiff's First Request for Documents shall continue to apply to the request for documents propounded herein.

2. The time period covered by Plaintiff's First Request for Documents, filed June 23, 1978, shall be January 1, 1968 through the present, with the exception that requests for specific documents or files identified in Exhibit 1 of Plaintiff's First Request for Documents shall be responded to irrespective of the date of such documents or files.

3. The following additional instructions shall also be

controlling as to all requests propounded in Plaintiff's First Request for Documents and to all supplemental requests propounded herein.

4. These requests for documents are of an ongoing nature and, should any defendant obtain, acquire or otherwise come into additional or further information responsive to these requests for documents, the answers thereto shall be updated to provide that information.

5. If a request is made for production or identification of documents which are no longer in the possession or subject to the control of a defendant, state when such documents were most recently in the possession of or subject to the control of a defendant and what disposition was made of them, including an identification of the person presently in possession or control of such documents. If the documents have been destroyed, identify the type of document, including date of origin, author and recipient, the person who destroyed the documents and the person who directed that the documents be destroyed, state when such documents were destroyed, state the reasons the documents were destroyed, and identify all persons having knowledge of the contents of such documents.

6. For each request for documents or part thereof which defendants refuse to answer on grounds of burdensomeness, state (a) the number of files and/or documents needed to be searched; and (b) the location of such files.

7. Each request for documents is to be responded to on the basis of the entire knowledge of defendants, including information in the possession of defendants, their agents, representatives, attorneys and subordinate agencies, offices and departments.

8. If any of the following requests for documents cannot be responded to in full, please answer to the extent possible and specify the reason for your inability to respond to the remainder, stating whatever information or knowledge you have concerning the unanswered portion. If your response is qualified in any particular, please set forth the details of such qualifications.

9. These instructions and the definitions set forth supra apply to each and every request for documents, whether specifically referenced in the particular request for documents or not.

10. If any document called for by this demand is withheld pursuant to a claim of privilege, identify that document, including its date and subject matter, and the identity of its author and persons to whom copies were furnished; also state the basis of the privilege claimed for withholding each such document.

DEFINITIONS

1. The definitions provided in Plaintiff's First Request for Documents, shall be controlling herein with the following exception, that the additional definition provided below shall now apply to requests for documents propounded in Plaintiff's First Request for Documents, as well as the requests propounded herein.

2. "Document" or "documents" shall mean any kind of written, recorded, or graphic matter, however produced or reproduced, of any kind or description regardless of origin or location, whether sent or received or neither, including originals, copies, drafts and both sides thereof, and including but not limited to entire files, live files, back-up files, informant files, information item files, soft files, squirrel files, numbered case files, investigative files, convenience files, personality files, biographical data files, civil disturbance files, incident files, dossiers, compendiums, card files, personnel security clearance dossiers, mug books, surveillance files, domestic security files, contracts, agreements, orders, notes, agents' notes, letters, memoranda, correspondence, invoices, pamphlets, cards, index cards, periodicals, telegrams, cables, telex messages, reports, raw data reports, spot reports, agent reports, records, studies, interoffice or intraoffice communications, working papers, talking papers, applications, permits, charts, papers, graphs, surveys, indices, tapes or other recordings, discs, data processing cards, sheets, discs or tapes, files, transcripts, diaries, calendars, lists, black

lists, schedules, analyses, accounts, objects, statements, manuals, drawings, technical proposals, personnel records, minutes and records of discussions, photographs, and any drafts, copies, photocopies, facsimiles, xeroxes, photographs, blueprints, books, tape recordings, videotapes, or microfilms, tangible things, notes, notations, inter and intradepartmental communications, communications to, from, between or among directors, officers, agents, consultants or employees, transcripts, minutes, reports and recordings (and any transcriptions thereof) of telephone or other conversations, or of interviews, or of conferences, or of meetings, affidavits, statements, summaries, opinions, reports, indices, studies, analyses, evaluations, court pleadings, subpoenas, civil investigative demands, contracts, licenses, agreements, ledgers, journals, tabloids, books of records of account, summaries of accounts, balance sheets, income statements, checks, vouchers, check registers, orders for payment, questionnaires, answers to questionnaires, statistical records, desk calendars, appointment books, diaries, telephone logs, lists, tabulations, charts, graphs, maps, surveys, sound recordings, data sheets, magnetic tapes, computer programs, computer program coding sheets, all other records kept by electronic photographic or mechanical means, and things similar to any of the foregoing, regardless of their authority or origin, however delineated by a defendant, of which a defendant has knowledge, whether or not such documents are in a defendant's possession, custody or control.

DOCUMENTS REQUESTED

1. Any and all documents that contain(ed) any asterisks, symbols, phrases or codes that served to indicate the use of surveillance, black bag jobs, surreptitious entries or electronic eavesdropping of plaintiff, its affiliated religious organizations and/or members or officers, which were deleted, between 1968 and the present, from any document released or withheld by defendants in processing information requests under Title 5, United States Code,

Section 552(a) et seq. (Freedom of Information Act) irrespective of the date of the document.

2. Any and all documents relating to electronic surveillance, surreptitious entries, black bag jobs, domestic subversive targeting, physical surveillance, mail surveillance, and/or interception and monitoring of international communications by any of the defendant agencies between January 1, 1955 and January 1, 1968, of the plaintiff or any of its affiliated religious organizations, or any officer or member thereof, or any attorney who at the time of such surveillance was engaged in representing any such organization, officer or member.

3. Any and all documents relating to the use or attempted use of informers and/or infiltrators by any of the defendant agencies during the period January 1, 1955 to January 1, 1968: (1) to obtain information with respect to plaintiff or any of its affiliated religious organizations, or an officer or member thereof, or any attorney who at the time of such activity was engaged in representing any such organization or person; and/or (2) to disrupt or otherwise hamper in any fashion the activities, organization, operation or growth of such organization.

4. Any and all documents relating to interrogation or other special scrutiny during the period between January 1, 1955 through the present, by any of the defendant agencies of any employee of or applicant for employment with any federal agency or with any individual, organization or corporation, doing business for or with any federal agency, to investigation, interrogation, or other special scrutiny, including but not limited to security investigation, because they are or were alleged to be Scientologists. Documents to be included under this request encompass any documents relating to (1) a decision by the defendant agencies to conduct such interrogation; (2) the nature of the investigation, interrogation or scrutiny; (3) the substance of the information derived therefrom; and (4) the personnel action taken, if any, including hiring, firing, declining to hire, promoting,

declining to promote, etc.

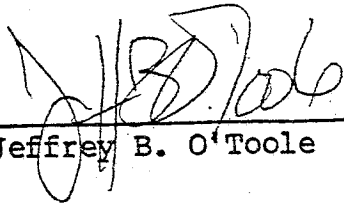
5. Any and all IRS documents containing information directly or indirectly relating to the allegations concerning plaintiff, its affiliated religious organizations, officers and/or members, communicated by IRS employees to Mr. Shirley Foley of the Department of Labor and included in Mr. Foley's Memorandum of November 29, 1967.

6. Any and all documents concerning any request, suggestion or recommendation received by or originated by a defendant or its sub-components between January 1, 1955 and January 1, 1968, to initiate, participate in or terminate any investigation or administrative action concerning plaintiff, its affiliated religious organizations and/or officers and members.

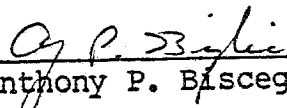
7. Any and all documents that plaintiff requested be identified in Plaintiff's Supplement to First Set of Interrogatories filed May 12, 1981, Questions: 2(c); 6; 7; 8; 10(f); 12(b)(4); 13(f); 15(b); 15(d); 16; 17(c); 18(b); 21(b); 21(c); 21(f); 22(a); and 25(d).

8. The following specific documents, designated in Exhibit 1, if not covered by the foregoing paragraphs, which have been withheld in whole or in part by the agencies listed below in FOIA proceedings or referenced in such FOIA documents. In some cases documents have been specifically described. In others they have been identified by the designation appearing on the agencies' indexes of documents withheld. Plaintiff requests the entire document, not merely the document that corresponds to the date in the indexes.

Respectfully submitted,


Jeffrey B. O'Toole

Dated: May 12, 1981


Anthony P. Bisceglie

CANAN, BURNS & O'TOOLE, P.C.
511 E Street, N.W.
Washington, D.C. 20001
(202)347-5212

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Plaintiff's Supplement to First Request for Documents was mailed, first class, postage prepaid, this 12th day of May, 1981 to:

Lawrence A. G. Moloney, Esq.
Department of Justice
10th and Constitution Avenue, N.W.
Civil Division, Room 3339
Washington, D.C. 20530

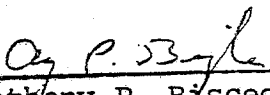

Anthony P. Bisceglie

EXHIBIT 1

U.S. NCB

From Vaughn Index

<u>Doc. #</u>	<u>Date</u>
K-4A	1/12/73
K-14	4/11/67
K-15	4/17/67
K-2A	Undated

POSTAL SERVICE

From Vaughn Index

<u>Doc. #</u>	<u>Date</u>
A 16	1/11/69
A 262	Undated
A 288	3/10/70
A 291	1/4/70

TREASURY DEPARTMENT

From Vaughn Index

<u>Doc #</u>	<u>Date</u>
4	Undated

EXHIBIT 1DEPARTMENT OF JUSTICE

From Vaughn Index

<u>Doc. #</u>	<u>Date</u>
32 (Section 3)	Undated
12 (Section 2)	9/22/66
18 (Section 2)	10/20/66
46 (Section 2)	3/6/67
80 (Section 2)	5/10/67
4 (Section 3)	6/6/67
5 (Section 3)	6/6/67
10 (Section 3)	6/19/67
52 (Section 4)	7/14/69
69 (Section 4)	9/3/72
59 (Section 5)	12/17/74
15 (Section 4)	9/10/78

Confidential Information Report dated April 1, 1959 referred to in a letter dated August 14, 1969, R. P. Hertzog to Louis Oberdorfer.

EXHIBIT 1FBI HEADQUARTERS

From Vaughn Index

<u>Doc. #</u>	<u>Date</u>
A-151	6/19/69
A-171	5/17/72
K-23	10/3/75
K-27	10/21/75

FBI FIELD OFFICES

From Vaughn Index

<u>Doc. #</u>	<u>Date</u>
<u>Boston</u>	
1	Undated
<u>Jacksonville</u>	
6	11/24/75
16	Undated
<u>Minneapolis</u>	
9	Undated
<u>New York</u>	
12	Undated
13	Undated
<u>Nevada</u>	
47-589	Undated
5	11/2/72
11	11/25/74
14	12/10/74
15	12/13/74
<u>Tampa</u>	
47-1479	Undated
62-1786	Undated
<u>Phoenix</u>	
47-2816	Undated

EXHIBIT 1

CIA

From Vaughn Index

Doc. #

Date

40

6/8/66

EXHIBIT 1

ARMY

- 1) Letter, Department of the Army, Office of the Assistant Chief of Staff for Intelligence, dated July 13, 1959. Subject: Scientology Dianetics, Hubbard Guidance Center et al. (U).

EXHIBIT 1DEA

From Vaughn Index

<u>Doc. #</u>	<u>Date</u>		
1	2/19/75	34	1/8/75
2	1/9/75	35	1/17/75
3	5/9/73	36	1/21/75
4	12/18/72	37	1/30/75
5	11/30/72	38	2/18/75
6	11/29/72	39	3/3/75
7	11/21/72	40	3/6/75
8	11/20/72	41	11/22/74
9	3/7/75	42	1/7/74
10	8/14/74	43	3/31/67
11	11/18/74	44	4/25/67
12	3/3/75	45	3/31/67
13	Undated	46	3/23/67
14	11/15/65	47	Undated
15	9/30/65	48	6/16/69
16	9/16/65	49	11/18/69
17	9/3/65	50	8/13/70
18	3/7/75	51	8/28/70
19	11/28/72	52	11/23/70
20	Undated	53	5/21/70
21	11/22/72	54	2/1/71
22	11/30/72	55	2/5/71
23	Undated	56	Undated
24	11/13/70	57	2/19/71
25	2/14/71	58	10/18/71
26	11/8/71	59	10/29/71
27	3/6/75	60	5/16/
28	3/6/75	61	1/24/
29	8/11/70	62	2/11/
30	12/5/74	63	Undated
31	12/10/74	64	Undated
32	12/16/74	65	6/6/74
33	12/30/74	66	7/24/74

1) Region 9, Milwaukee, Wisconsin Memorandum dated June 19, 1969 requesting subscriber listings for telephone numbers called by certain subjects.

2) Memorandums dated August 11 and August 12, 1969 containing a partial list of subscribers in response to the above Memorandum of June 19, 1969.

3) Report of Investigation dated June 14, 1970 requesting telephone subscriber information and record checks.

EXHIBIT 1U.S. ATTORNEY, D.C.

From Vaughn Index

<u>Doc. #</u>	<u>Date</u>		
I-C-2	3/11/59	II-T-54	Undated
I-C-5	Undated	II-T-55	Undated
		II-T-59	Undated
I-F-9	Undated	II-T-61	Undated
		II-T-62	Undated
II-D-34	5/6/66	II-T-63	Undated
II-D-72a	9/12/69	II-T-64	Undated
II-D-89	8/19/71	II-T-66	Undated
II-D-93	9/7/71	II-T-67	Undated
II-D-95	3/23/72	II-T-68	Undated
II-D-97	3/27/72	II-T-69	Undated
II-D-102	5/17/72	II-T-70	Undated
II-D-117	Undated	II-T-71	Undated
II-D-131	6/10/74	II-T-72	Undated
II-D-134	Undated	II-T-73	Undated
		II-T-74	Undated
II-F-16	5/4/71	II-T-75	Undated
		II-T-76	Undated
II-G-5	6/15/64	II-T-78	Undated
II-G-23b	4/2/68	II-T-79	Undated
II-G-37	3/30/72	II-T-82	Undated
II-G-58	Undated	II-T-83	4/4/67
II-G-59	Undated	II-T-85	Various dates
II-I-1	10/10/61	II-T-87	Undated
		II-T-89	Undated
II-J-1	3/25/69	II-T-90	Undated
II-J-5	Undated	II-T-91	Undated
		II-T-92	Undated
II-K-2	3/27/67	II-T-93	Undated
		II-T-94	Undated
II-T-6	3/31/67	II-T-95	Undated
II-T-11	Undated	II-T-99	7/22/70
II-T-12	Undated	II-T-100	Undated
II-T-13	Undated	II-T-105	Undated
II-T-14	Undated	II-T-106	Undated
II-T-15	Undated		
II-T-17	Undated	III-A-2	Undated
II-T-19	Undated	III-A-9	Undated
II-T-20	Undated	III-A-13	Undated
II-T-21 thru		III-A-15	Undated
II-T-33	Undated	III-A-16	Undated
II-T-35	Undated	III-A-23	Undated
II-T-37	Undated	III-A-27	Undated
II-T-45	Undated		
II-T-46	Undated	V	1974/75
II-T-47	Undated		
II-T-49	Undated		
II-T-50	Undated		
II-T-51	Undated		
II-T-53	Undated		

EXHIBIT 1IRS

From Vaughn Index

<u>Doc. #</u>	<u>Date</u>		
18	Undated	5328	5/23/64
60	Undated	153	5/4/66
79	Undated	45	8/28/66
145	Undated	158	10/26/66
236	Undated	5306	12/12/66
369	Undated	113	12/19/66
422	Undated	5387	3/ /67
3046	Undated	108	4/13/67
3047	Undated	5320	5/12/67
4069-77	Undated	5272	6/13/67
5258	Undated	5266	6/16/67
5296	Undated	5909-FF	6/16/67
5629	Undated	513	6/30/67
6043	Undated	5909-0	7/28/67
6104	Undated	6110	10/16/67
2579	Undated	6102-B	10/16/67
2591	Undated	6107	10/23/67
2734	Undated	5847	11/9/67
2780-F	Undated	6105-A	12/23/67
3930-11	Undated	4069-71	5/3/68 to 8/19/68
3930-13 thru		4069-38	8/21/68
3930-23	Undated	4069-24	8/29/68
3930-34-2	Undated	4069-26	9/4/68
3930-61	Undated	4069-25	9/17/68
3930-63-2	Undated	4069-66	9/18/68
3930-64	Undated	4069-41	10/4/68
4060	Undated	3930-0	10/18/68
4069-1	Undated	4069-51	10/24/68
4069-8	Undated	3930(i)1	11/1/68
4069-12	Undated	3930(i)2	4/22/69
4069-42	Undated	3930(i)3 thru	
4069-43	Undated	3930(i)8	Undated
4069-44	Undated	2601-2610	Various dates
4069-46	Undated	6397	Various dates
4069-55-2	Undated	4069-23	2/6/69
8	Undated	4069-20	2/18/69 - 3/10/69
4069-64	Undated	4069-21	2/28/69
4069-72	Undated	4069-34	3/13/69 - 4/1/69
4069-73	Undated	4069-60	3/30/69
5594	Undated	3930-5	4/1/69
6396-A	Undated	4069-35	4/18/69
3611	Undated	4069-19	4/21/69
3612	Undated	4069-55-3	4/3/69
		4069-65	4/30/69
144	8/13/59	4069-17	5/6/69
101	6/17/61	6395-A	Various dates
100	6/19/61	2613-2619	Various dates
47	7/27/61	2622-B	5/5/70
105	7/7/61	2623-B	1/20/65
75	2/19/62	4069-37	5/6/69
78	1/28/63	4069-15	6/12/69
123	2/6/63	4069-11	6/26/69
129	2/13/63	54	7/8/69
74	2/19/63	39	7/14/69
77	4/24/63	37	7/15/69
6046	7/5/63		
6054	9/9/63		

EXHIBIT 1IRS

From Vaughn Index

<u>Doc. #</u>	<u>Date</u>		
35	7/18/69	2749	1/15/73
4069-9	7/18/69	2746	1/17/73
5980	8/12/69	2745	1/18/73
3930-Q	8/19/69	2743	2/15/73
5979	9/9/69	2744	2/15/73
6385	11/14/69	2733	3/2/73
4069-6	11/19/69	2740	3/26/73
201	1/27/70	2894	3/26/73
6356-B	Various dates	2739	3/27/73
3491(a)	7/13/70	510	4/5/73
3969	8/25/70	457	4/10/73
3796	8/25/70	3793	6/6/73
4069-4	9/23/70	3093	6/26/73
3780(b)	10/29/70	4069-62	7/26/73
2680	Undated	464	7/27/73
165	1/18/71	465	7/27/73
188	1/22/71	468	8/7/73
164	1/28/71	4069-67	8/15/73
5945	3/6/71	389	10/29/73
5946	2/26/72	3930-31	10/30/73
5947	9/22/71	6264	Various
5949	8/10/71		dates
5950	3/16/72	5127	11/13/73
4069-3	4/30/71	189	11/15/73
2563	6/2/71	3239(b)	12/7/73
2564	6/21/71	3930-32	12/19/73
2566	6/21/71	3930-33	12/20/73
2565	6/23/71	3241	12/26/73
3591-A	6/28/71	3926-A	12/27/73
2598	7/8/71	2569	12/27/73
5112	Various dates	3593	Oct - Dec, 1973
2876	4/5/72, 4/3/72	3930-35	1/9/74
2875	4/5/72	3930(g)	1/9/74
2877	4/18/72	3791-A	1/14/74
2878	4/18/72	3930-37	1/18/74
2880	4/27/72	2620-A	1/25/74
2882	5/5/72	3095	1/30/74
2883	5/5/72	5336	Various
3930-60-4	5/21/72		dates
5506	6/12/72	3930-39	3/7/74
2567	6/21/72	3930-40	3/7/74
3219	8/8/72	3930-41	3/7/74
2678	8/23/72	3930-42	3/11/74
4069-68	8/31/72	3930-45	3/21/74
2679	8/31/72	2568	3/27/74
3083	9/3/72	2570	3/27/74
196	Various dates	3930(h)	3/29/74
3598	11/13/72	3930-48	4/1/74
3105	11/27/72	5149	4/2/74
6237	11/27/72	3930-50	4/4/74
3082	12/1/72	3930-51	4/12/74
2589	12/8/72	3930-L	4/16/74
3600-A	12/8/72, 12/5/72,	3930-53	4/19/74
	11/30/72	3930-54	4/24/74
3092	Undated	3901	4/29/74
		2756-A	5/1/74
		2723	5/2/74
		5151	5/2/74
		3592	5/10/74
		5135	5/10/74
		5619	5/10/74
		3159	4/9/74
		2600	5/16/74

EXHIBIT 1IRS

From Vaughn Index

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